

HEARING DATE AND TIME: November 13, 2015 at 12:00 p.m. (Eastern Time)  
RESPONSE DEADLINE: November 6, 2015 at 4:00 p.m. (Eastern Time)

**LOWENSTEIN SANDLER LLP**

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*Counsel to First Choice Power, L.P.  
Reliant Energy Services, Inc. and  
Reliant Energy Power Supply, Inc.*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

LEHMAN BROTHERS HOLDINGS, INC., *et al.*,  
  
Debtors.

Chapter 11

Case No. 08-13555 (SCC)  
(Jointly Administered)

**JOINDER OF FIRST CHOICE POWER, L.P., RELIANT ENERGY SERVICES, INC.  
AND RELIANT ENERGY POWER SUPPLY, LLC TO OBJECTIONS TO DEBTORS'  
RENEWED MOTION TO ALLOW DISCLOSURE OF THE DERIVATIVE  
QUESTIONNAIRES PURSUANT TO SECTION 107(2) OF THE BANKRUPTCY CODE**

First Choice Power, L.P. ("FCP") and the Reliant Entities (defined below)<sup>1</sup>, by and through their counsel, Lowenstein Sandler LLP, join in the various supplemental objections to Debtors' *Renewed Motion to Allow Disclosure of the Derivative Questionnaires Pursuant to Section 107(a) of the Bankruptcy Code* (the "Renewed Motion") [D.I. 51311]. Like the parties

<sup>1</sup> Various entities identified above and formerly known as Reliant Energy (the "Reliant Entities") also join in this joinder.

filing the objections to the Renewed Motion, FCP and the Reliant Entities prepared and filed a Derivative Questionnaire containing certain confidential and proprietary trading and other information in reliance upon the confidentiality protections set forth in the Bar Date Order.

Yesterday evening, counsel for the Debtors proposed a resolution in connection with the Renewed Motion which FCP and the Reliant Entities are now evaluating. However, given the objection deadline set for the Renewed Motion, FCP and the Reliant Entities file this Joinder to protect their interests in the event a resolution cannot be reached.

WHEREFORE, FCP and the Reliant Entities respectfully request that the relief requested in the Renewed Motion be denied, or in the alternative and in the event this Court orders disclosure, that appropriate protections be maintained with respect to the confidential and proprietary information set forth in the Derivative Questionnaire so that such information is not made generally public.

Respectfully submitted,

Dated: November 6, 2015

**LOWENSTEIN SANDLER LLP**

By: /s/ Michael S. Etkin

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